

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

Rooterman, LLC
Plaintiff,
v.
Klodian Belegu, Quality Air Care
Corporation, RM Water Damage
Restoration LTD and 911 Sewer & Drain
Corporation.
Defendants.

JOINT STATUS REPORT PURSUANT TO THIS COURT’S

JANUARY 29, 2025 ELECTRONIC ORDER

Plaintiff Rooterman, LLC (“Rooterman” or “Plaintiff”) and Defendants Klodian Belegu, Quality Air Care Corporation, RM Water Damage Restoration LTD and 911 Sewer & Drain Corporation (collectively, “Defendants”) hereby jointly submit this status report, pursuant to Court’s Electronic Order of January 29, 2025, as follows:

1. The parties have not been able to resolve their disputes or agree upon a continued mediation following their initial mediation on December 4, 2024. However, the possibility of agreeing upon a continued mediation remains, and the parties have preliminarily agreed upon a mediator. The parties will continue to confer in this regard.
2. Mr. Belegu returned hard copies of certain franchise materials to Rooterman on or about February 5, 2025. Plaintiff states that Mr. Belegu has not returned all property belonging to Rooterman. While Mr. Belegu has returned hard copies of certain franchise materials, Plaintiffs believe that Defendants have not returned the various

telephone numbers that were provided in writing to Defendants' counsel on January 31, 2025. Defendants do not agree that the agreements obligate transfer of those specific telephone numbers.

3. Plaintiff has requested March 7, 12 or 13 for Mr. Belegu's deposition, promptly after Mr. Belegu is scheduled, per this Court's January 29, 2025 Order to submit his required Declaration (which per such Order, is due February 28, 2025). Mr. Belegu and his counsel indicate they are available for such deposition on March 12, 2025. At the present time, the parties anticipate that Mr. Belegu's deposition will take place on March 12, 2025.

Respectfully submitted,

PLAINTIFF ROOTERMAN, LLC

By its counsel

Dated: February 12, 2025

/s/ Jeffrey Rosin
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DEFENDANTS KLODIAN BELEGU,
QUALITY AIR CARE CORPORATION,
RM WATER DAMAGE RESTORATION
LTD, and 911 SEWER & DRAIN
CORPORATION

By their counsel

Dated: February 12, 2025

/s/ Jay Wolman

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CERTIFICATE OF SERVICE

I hereby certify that on the 12th day of February 2025, *Joint Status Report* was electronically filed. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt.

/s/ Lisbeth Valdez
Lisbeth Valdez